

January 14, 2016

Mr. Scott Manzano Oregon Department of Environmental Quality 700 NE Multnomah St., Suite 600 Portland, Oregon 97204

RE: **RESPONSE TO DECEMBER 21, 2015 LETTER**

RESPONSE TO DEQ COMMENTS ON OUTFALL 22B IRAM PERFORMANCE MONITORING

SECOND QUARTER 2015 REPORT RP-PORTLAND SITE ECSI #155

SUBMITTED BY EMAIL

Dear Mr. Manzano:

On behalf of StarLink Logistics, Inc. (StarLink), this letter transmits Estimated Maximum Potential Concentration (EMPC) results for the Outfall 22B IRAM Performance Monitoring Second Quarter 2015 sampling and groundwater monitoring EMPC results.

Please note the following:

- For the Outfall 22B 2nd Quarter 2015 sample results, the EMPC results provided in the attached table were reported in Table 6 of the report but were not specifically identified as "EMPC" results. We will continue to report and clearly identify "EMPC" results in future reports.
- We are providing dioxin/furan groundwater EMPC results in the attached "Groundwater EMPC Results" table. These data were not reported in the Appendix C tables in the RI/SCE report¹ which was consistent with the approved work plan and QAPP relevant at the time.

If you have any questions, please contact Joan Underwood at (503) 278-1837 or Kent Angelos at (425) 883-0777.

Sincerely,

GOLDER ASSOCIATES INC.

Kent M. Angelos

Principal and Senior Program Leader

S. Dearden, Sanofi US

J. Underwood, QMG

J. Benedict, Cable Huston

E. DeMaria, EPA

Enclosed: Outfall 22B 2nd Quarter 2015 IRAM Performance Monitoring - Summary of EMPC

Results

Groundwater EMPC Results

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¹ AMEC, 2010. RI/SCE Report – RP-Portland Site – Portland, Oregon. Prepared by AMEC Earth and Environmental, Inc. submitted to Oregon Department of Environmental Quality, November 19, 2010.



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Outfall 22B 2nd Quarter 2015 IRAM Performance Monitoring - Summary of EMPC Results

	Outfall 22	B Samples	Field Blank				Manhole Samples			
	Outfall 22B	Outfall 22B Duplicate	Rinsate Blank	MH-3	MH-4	MH-6	MH-7	MH-8	MH-10	METRO-MH-9
	22B-U-S-060815	22B-U-D-060815	22B-U-RB-060915	22B-U-MH3-060815	22B-U-MH4-060915	22B-U-MH6-060915	22B-U-MH7-060915	22B-U-MH8-061015	22B-U-MH10-061015	Metro-U-MH9-
Constituent	6/8/2015	6/8/2015	6/9/2015	6/8/2015	6/9/2015	6/9/2015	6/9/2015	6/10/2015	6/10/2015	061015
Dioxins & Furans, Method										
1,2,3,4,6,7,8-HpCDD	2.09 EMPC, U	1.25 EMPC, U		2.24 EMPC, U						1.97 EMPC, U
2,3,7,8-TCDD				1.72 EMPC, U		3.63 EMPC, U				
OCDF								3.31 EMPC, U		
Chlorinated Biphenyl Con	geners, Method 166	58. pg/L						1 2.2.1 2.1.1 2, 2		
PCB 119				1.12 EMPC, U						
PCB 123							1.68 EMPC, U			
PCB 124								3.45 EMPC, U		
PCB 126				0.799 EMPC, U						
PCB 136		12.8 EMPC, U								
PCB 144	3.39 EMPC. U	4.22 EMPC, U				4.97 EMPC. U	2.58 EMPC, U			
PCB 147		2.52 EMPC, U				1.77 EIVII 0, 0	2.57 EMPC. U	3.66 EMPC, U	2.02 EMPC. U	
PCB 151		2.32 EIVII 0, 0					17.2 EMPC, U	3.00 EIVII C, 0	2.02 EIVII 0, 0	
PCB 156							5.98 EMPC, U			
PCB 171						4.82 EMPC, U	5.96 EIVIFG, U			
PCB 171						4.02 LIVII C, U	2.44 EMPC, U			
PCB 177						9.42 EMPC. U	2.44 EIVIFG, U			
PCB 177						9.42 EIVIFG, U			1.12 EMPC, U	
PCB 19						9.74 EMPC, U			1.12 EIVIPG, U	
PCB 190						2.9 EMPC, U				
								1.61 EMPC, U		
PCB 191	4 OF FMDO II								1.15 EMPC, U	
PCB 193	1.95 EMPC, U					0.04 FNADO 11			3.27 EMPC, U	
PCB 194						9.34 EMPC, U				
PCB 200								2.9 EMPC, U		
PCB 201	2.07 EMPC, U									
PCB 202				5.21 EMPC, U						
PCB 207		0.948 EMPC, U								
PCB 208	2.22 EMPC, U			3.1 EMPC, U					6.26 EMPC, U	
PCB 209						6.52 EMPC, U				
PCB 25				2.09 EMPC, U		4.61 EMPC, U				
PCB 26		6.47 EMPC, U								
PCB 38			2.92 EMPC, U							
PCB 46		3.54 EMPC, U								
PCB 55										0.678 EMPC, U
PCB 63		0.828 EMPC, U		0.696 EMPC, U	0.837 EMPC, U					
PCB056 & 060	14.9 EMPC, U		0.744 EMPC, U							
PCB061 & 070			0.895 EMPC, U							
PCB111 & 115	1.2 EMPC, U	1.06 EMPC, U							1.43 EMPC, U	
PCB133 & 142		1.78 EMPC, U		2.13 EMPC, U						
PCB134 & 143				3.36 EMPC, U						
Total Heptachlorobiphenyls	169 EMPC					155 EMPC	158 EMPC	281 EMPC	284 EMPC	
Total Hexachlorobiphenyls	316 EMPC	329 EMPC		376 EMPC		359 EMPC	320 EMPC	467 EMPC	474 EMPC	
Total Nonachlorobiphenyls	9.17 EMPC	14.6 EMPC		14.6 EMPC					30.5 EMPC	
Total Octachlorobiphenyls	53.6 EMPC			119 EMPC		40.7 EMPC		108 EMPC		
Total Pentachlorobiphenyls	581 EMPC	594 EMPC		580 EMPC			428 EMPC	478 EMPC	631 EMPC	
Total Tetrachlorobiphenyls	453 EMPC	519 EMPC	224 EMPC	455 EMPC	525 EMPC					317 EMPC
Total Trichlorobiphenyls		267 EMPC	2.9 EMPC	212 EMPC		285 EMPC				
Chlorinated Insecticides,		20, 21411 0	21, 21111 0	2.2.2.1111.0		200 ZIVII O		!	·	
4,4'-DDD	211 EMPC. U									
4.4'-DDE										85.5 EMPC, U
					1					UU.U EIVIF U, U
alpha-Chlordane	86.6 EMPC, U									



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Outfall 22B 2nd Quarter 2015 IRAM Performance Monitoring - Summary of EMPC Results

_	Outfall 22	2B Samples	Field Blank				Manhole Samples			
	Outfall 22B	Outfall 22B Duplicate	Rinsate Blank	MH-3	MH-4	MH-6	MH-7	MH-8	MH-10	METRO-MH-9
	22B-U-S-060815	22B-U-D-060815	22B-U-RB-060915	22B-U-MH3-060815	22B-U-MH4-060915	22B-U-MH6-060915	22B-U-MH7-060915	22B-U-MH8-061015	22B-U-MH10-061015	Metro-U-MH9-
Constituent	6/8/2015	6/8/2015	6/9/2015	6/8/2015	6/9/2015	6/9/2015	6/9/2015	6/10/2015	6/10/2015	061015
delta-BHC				42.3 EMPC, U						
Endosulfan I	139 EMPC, U	195 EMPC, U	140 EMPC, U				156 EMPC, U	176 EMPC, U		
Endosulfan II										825 EMPC, U
Endrin	72.9 EMPC, U								248 EMPC, U	
Endrin Aldehyde	559 EMPC, U	316 EMPC, U		130 EMPC, U	210 EMPC, U		192 EMPC, U			254 EMPC, U
Endrin Ketone	320 EMPC, U	277 EMPC, U		287 EMPC, U	160 EMPC, U		389 EMPC, U	790 EMPC, U		
gamma-Chlordane									145 EMPC, U	
Heptachlor Epoxide				61.9 EMPC, U						
trans-Nonachlor							126 EMPC, U			

Notes:

EMPC: Estimated Maximum Potential Concentration

EMPC, U: Estimated Maximum Potential Concentration, associated sample result reported by the laboratory as not detected.

---: EMPC results not reported



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Groundwater EMPC Results

	AL2-17	AL2-17	AL2-32	AL2-32	AL2-32	AL2-46	AL2-46	AL2-46
Constituent	7/6/2001	4/22/2002	7/5/2001	4/19/2002	4/20/2004	7/5/2001	4/22/2002	4/21/2004
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD								
EMPC-HPCDF			11.8 U					
EMPC-HXCDD			24.9 U		12.7 N			
EMPC-HXCDF				4.7 N	13.6 N		3.9 N	5.9 NJ
EMPC-PECDD								
EMPC-PECDF			26.7 U	28.7 NJ	29.9 N	75 NJ	64.3 N	
EMPC-TCDD	17 N		30.8 U	65.9 NJ	38.4 N	223 NJ	126 N	
EMPC-TCDF	84.6 N	116 NJ	369 U	214 NJ	450 N	13020 N	6120 N	

Notes:

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Groundwater EMPC Results

	AL5-19	AL6-96	MW-03-81	MW-03-81	MW-03-I(60)	MW-03-S(27)	MW-04-47	MW-04-47
Constituent	10/5/2000	4/19/2004	10/13/2000	6/25/2001	10/13/2000	10/13/2000	7/5/2001	4/19/2002
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD								
EMPC-HPCDF								20 N
EMPC-HXCDD	3.7 N	9000 N	4.9 N	2.3 N	14.7 N	24.5 N		
EMPC-HXCDF						10.8 N		38.9 N
EMPC-PECDD					2.7 N	4.4 N		10.8 N
EMPC-PECDF	51.1 N		1.3 N			23.3 N	33.3 N	466 N
EMPC-TCDD		4600 U			1.4 N		21.7 N	342 N
EMPC-TCDF	144 N		17 N			40.1 N	180 N	1500 N

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Groundwater EMPC Results

	MW-05-52	MW-05-52	MW-05-52	MW-05-70	MW-05-70	MW-05-70	MW-09-23	MW-09-23
Constituent	7/6/2001	4/22/2002	4/22/2004	7/6/2001	4/22/2002	4/22/2004	7/2/2001	4/17/2002
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD						1.7 N		
EMPC-HPCDF			8.6 N			0.74 N		
EMPC-HXCDD	12 U		2.3 N				3.3 N	
EMPC-HXCDF	30.2 N						10.2 N	
EMPC-PECDD							25.4 N	11 NJ
EMPC-PECDF		275 N	450 N	46 N	25.3 U			
EMPC-TCDD	1140 N	1210 N		44.1 N		35.1 N	13.4 N	
EMPC-TCDF	5140 U	1750 N	2360 N	235 N	211 N	119 N	5.6 N	

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Groundwater EMPC Results

	MW-09-42	MW-09-42	MW-09-58	MW-09-58	MW-09-58	MW-09-80	MW-09-80	NDL-101-GW
Constituent	7/2/2001	4/17/2002	9/26/2000	7/2/2001	4/18/2002	10/5/2000	7/2/2001	12/3/2003
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD				7 N				
EMPC-HPCDF								126 N
EMPC-HXCDD	1.5 N				2.8 N		3.7 N	72.9 N
EMPC-HXCDF	0.62 N							124 N
EMPC-PECDD	19.4 N			5.1 N				14.4 N
EMPC-PECDF	11.8 N	8.3 NJ	2.1 N	47 N			26.7 N	731 N
EMPC-TCDD				19 N			15.1 N	161 N
EMPC-TCDF	17.3 N	16.3 NJ				11.1 N	31.3 N	3550 N

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Groundwater EMPC Results

	NDL-103-GW	NDL-104-GW	NDL-105-GW	NDL-106-GW	NDL-107-GW	NDP-101-GW	RP-01-31	RP-01-31
Constituent	12/10/2003	12/3/2003	12/3/2003	12/2/2003	12/9/2003	12/3/2003	10/11/2000	4/5/2002
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD						9.9 N		
EMPC-HPCDF			118 N		83.6 N			2.2 N
EMPC-HXCDD		14.9 N	41.2 N				11.9 N	43.2 N
EMPC-HXCDF	49.2 N		117 N	41.6 N	50.3 N			11.8 NJ
EMPC-PECDD			11.3 N					8 N
EMPC-PECDF	322 N	96.6 N	1060 N	169 N	164 N	3.5 N		
EMPC-TCDD	41.3 N	6.8 N	195 N		31.7 N		2.4 N	
EMPC-TCDF	1550 N	371 N	4410 N	454 N	1120 N	1.8 N		15.5 N

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Groundwater EMPC Results

	RP-01-51	RP-01-51	RP-01-51	RP-01-51	RP-01-65	RP-01-65	RP-01-65	RP-02-31
Constituent	10/11/2000	6/26/2001	4/8/2002	4/15/2004	10/11/2000	4/5/2002	4/15/2004	10/16/2000
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD								7.3 N
EMPC-HPCDF			2.1 N					3.6 N
EMPC-HXCDD	10.7 N	39.7 NJ			10.2 N	16.1 UJ		
EMPC-HXCDF		48.6 NJ	8.9 UJ	1.2 U			6.7 U	
EMPC-PECDD			1.6 N					
EMPC-PECDF	2.4 N		4.6 N			11.6 UJ	3.5 U	3.5 N
EMPC-TCDD	1.8 N		1.4 N			3.4 UJ		
EMPC-TCDF			2.4 N					13.2 N

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Groundwater EMPC Results

	RP-02-31	RP-02-31	RP-02-49	RP-02-49	RP-02-49	RP-02-66	RP-02-66	RP-02-66
Constituent	6/19/2001	4/4/2002	10/16/2000	6/19/2001	4/4/2002	10/16/2000	6/19/2001	4/4/2002
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD		20.6 N						
EMPC-HPCDF		17.2 NJ	1.8 N					
EMPC-HXCDD	2.6 N	18.3 NJ			2.3 U		2.9 N	7.9 U
EMPC-HXCDF	3.4 N	27.9 NJ			3.8 U			18.3 U
EMPC-PECDD		4.5 N						
EMPC-PECDF		20.8 NJ			4.7 U	0.66 N		
EMPC-TCDD	5.2 N			22.1 NJ		0.68 N	33.7 NJ	
EMPC-TCDF		19.1 NJ		8.9 NJ		4.3 N	6.3 NJ	3 U

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Groundwater EMPC Results

	RP-02-66	RP-03-30R	RP-03-30R	RP-03-30R	RP-03-52R	RP-03-52R	RP-04-16	RP-04-16
Constituent	4/12/2004	10/12/2000	6/27/2001	4/19/2004	10/12/2000	4/10/2002	10/4/2000	7/3/2001
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD								
EMPC-HPCDF								47.4 N
EMPC-HXCDD		6.5 N			82.1 N	6.9 N	924 N	3.7 N
EMPC-HXCDF						11.8 N		89 N
EMPC-PECDD	3.1 N						1000 N	33.5 N
EMPC-PECDF			2.9 N				108280 N	2960 N
EMPC-TCDD		2.3 N		50 N		6.2 N	49340 N	1760 N
EMPC-TCDF	3.5 U		2.5 N		7.2 N		247490 N	12130 NJ

Notes:

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Groundwater EMPC Results

	RP-04-16	RP-04-16	RP-04-41	RP-04-41	RP-04-41	RP-06-30	RP-06-87	RP-06-87
Constituent	4/18/2002	4/21/2004	7/3/2001	4/18/2002	4/21/2004	10/12/2000	10/12/2000	6/27/2001
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD								
EMPC-HPCDF		11.9 N			21820 N			
EMPC-HXCDD	7.1 N		7.6 N	6.4 N	4830 N	9.1 N	12.8 N	
EMPC-HXCDF		28.3 N	113 NJ	80.6 N	30960000 N		2.1 N	
EMPC-PECDD	13.8 N		32.1 NJ		11270 N			
EMPC-PECDF	2110 N	1230 N		1960 N	624050000 N			
EMPC-TCDD	1150 N		1690 N	1270 N	340700 N		2 N	1.5 N
EMPC-TCDF	7150 N	6380 N	7690 N	5620 N	445540 N	1.8 N	4.5 N	4.3 N

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Groundwater EMPC Results

	RP-06-87	RP-07-119	RP-07-30	RP-07-55	RP-07-84	RP-07-84	W-04-89	W-04-89
Constituent	4/10/2002	5/3/2002	5/3/2002	5/3/2002	5/3/2002	4/13/2004	10/9/2000	6/26/2001
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD			17.1 N	6.2 N		5 N		13.9 N
EMPC-HPCDF			9.3 N					
EMPC-HXCDD		5.9 N	8 N	10.1 N	8.8 N		19.3 N	11.2 N
EMPC-HXCDF	3.8 NJ		4.2 N				21.2 N	11.9 N
EMPC-PECDD	5.5 NJ							
EMPC-PECDF						4.7 N		9.7 N
EMPC-TCDD	3.4 N							
EMPC-TCDF	5.3 N				1.8 N	1.4 U	6.4 N	

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Groundwater EMPC Results

	W-04-89	W-04-I(49)	W-06-B(67)	W-06-D(49)	W-06-S(27)	W-09-116	W-11-B(122)	W-11-B(122)
Constituent	4/8/2002	10/9/2000	9/28/2000	9/28/2000	9/28/2000	4/20/2004	6/21/2001	4/9/2002
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD	6.2 N						2.9 N	
EMPC-HPCDF	1.7 N							
EMPC-HXCDD	1.8 U	3.7 N						
EMPC-HXCDF				1.9 N				
EMPC-PECDD								4.2 N
EMPC-PECDF	10.4 N		4.2 N		157 N			
EMPC-TCDD			10.8 N					
EMPC-TCDF		2.5 N		27.3 N	498 N	285 N		

Notes:

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Groundwater EMPC Results

	W-11-B(122)	W-11-D(91)	W-11-D(91)	W-11-D(91)	W-11-I(60)	W-11-I(60)	W-11-I(60)	W-11-S(21)
Constituent	4/14/2004	10/10/2000	6/21/2001	4/14/2004	10/10/2000	6/21/2001	4/9/2002	10/10/2000
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD							5.1 N	
EMPC-HPCDF				1.1 N		143 N	2 N	
EMPC-HXCDD	3.1 N	4.2 N			6.8 N			128 N
EMPC-HXCDF	4.9 N				4.9 N		1 N	161 N
EMPC-PECDD	1.9 N							12 N
EMPC-PECDF	6.4 N			0.84 N				168 N
EMPC-TCDD					3.5 N		1.4 N	35 N
EMPC-TCDF			31.3 N	152 N	15.7 N			279 N

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Groundwater EMPC Results

	W-11-S(21)	W-11-S(21)	W-15-D(62)	W-15-I(38)	W-15-I(38)	W-15-I(38)	W-15-S(14)	W-15-S(14)
Constituent	6/21/2001	4/9/2002	9/29/2000	9/29/2000	6/20/2001	4/11/2002	6/22/2001	4/11/2002
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD	7.1 N	1.5 N						
EMPC-HPCDF								
EMPC-HXCDD					0.52 N		3.1 N	
EMPC-HXCDF	2.5 N		11 N	1.6 N		19.7 NJ	8.6 N	
EMPC-PECDD	3.8 N		31.7 N					1.3 N
EMPC-PECDF	22.2 N							
EMPC-TCDD		3.4 N					1.8 N	
EMPC-TCDF	64.5 N				8.3 N			

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Groundwater EMPC Results

	W-16-31	W-16-31	W-16-31	W-16-D(85)	W-16-I(50)	W-16-I(50)	W-19-D(68)	W-19-I(49)
Constituent	10/17/2000	6/22/2001	4/8/2002	10/17/2000	10/17/2000	6/22/2001	10/16/2000	10/16/2000
Dioxins & Furans, Method 8290, pg/L								
EMPC-HPCDD								
EMPC-HPCDF			3.5 U				10.5 N	
EMPC-HXCDD	5.5 N	1.8 N	2.2 U		7.6 N		4.2 N	
EMPC-HXCDF				0.56 N	1.3 N	1 N		2.5 N
EMPC-PECDD	0.82 N					1.6 N		
EMPC-PECDF				0.77 N				
EMPC-TCDD							9.5 N	
EMPC-TCDF	2 N			2.4 N	18.9 N	1.4 N	20.6 N	9.6 N

Notes:

EMPC: Estimated Maximum Potential Concentration

N = presumptively identified result

 $\label{eq:NJ} \textit{NJ} = \textit{presumptively identified and estimated result}$

U = not detected at or greater than the stated level

UJ = not detected at or greater than the stated level which is an approximate value

